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December 9, 2019

Gary Fisher  
Environmental Engineering Manager  
Nokia of America Corporation  
600 Mountain Avenue  
Room 2A-359  
Murray Hill, NJ 07974-2070

**Approval**

13DEC 10:58AM

Re: Nokia Corporation of America Murray Hill Facility - 600 Mountain Avenue  
Murray Hill, (Township of Berkeley Heights & Borough of New Providence), Union County  
NJDEP SRWMP Case/PI #008315; ISRA Case No, 95514; U.S. EPA ID #NJD006980924  
February 2018 Remedial Action and Technical Impracticability Determination Report for  
AOC MH-2B (Ground Water Contamination)  
November 2018 Ground Water Monitoring Program Proposal  
October 2 and 11, November 14, and December 4, 2019 Email Correspondence

Dear Mr. Fisher:

The New Jersey Department of Environmental Protection (Department) has completed a review of the above referenced remedial action (RA) report (RAR), submitted pursuant to the Site Remediation Reform Act, N.J.S.A.58:10C-1 *et seq.*, and associated regulations, the Administrative Requirements for the Remediation of Contaminated Sites, N.J.A.C. 7:26C, and the Technical Requirements for Site Remediation, N.J.A.C. 7:26E. The report includes a technical impracticability (TI) proposal in regards to further ground water remediation. Associated additional information on the site ground water monitoring program was submitted November 16, 2018. The report and the ground water monitoring were further discussed in email correspondence of October 2 and 11, November 14, and December 4, 2019.

The Department has determined that the RAR, the associated November 2018 proposal, and the associated October, November, and December 2019 email correspondence, are in compliance with N.J.A.C. 7:26E, and other applicable requirements, and hereby approves the RAR effective the date of this letter.

Technical Impracticability and Monitored Natural Attenuation

As noted in the October 2, 2019 email, the TI proposal is considered acceptable for the site ground water contaminant source area, the area shown as an inset of Figure 2 of the report, with the remainder of the plume considered to be addressed through monitored natural attenuation.

During ongoing ground water monitoring and TI evaluation, if contaminant levels rebound to levels approaching those prior to the initiation of remediation, additional action will have to be considered or justification provided as to why that would not be necessary. Additional action will be necessary if contaminant migration is seen to occur or if receptors are at risk. Also, the duration of the revised ground water classification exception area (CEA) proposal in the report shall be re-evaluated during preparation of the biennial certifications if contaminant levels increase.

#### Ground Water Monitoring Program

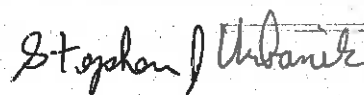
A proposed CEA and TI monitoring program was included in the February 2018 report. Five (5) additional monitoring wells were added to the monitoring program with the November 2018 proposal. Four (4) more monitoring wells were added to the program with the October 2019 email correspondence. A list of the monitoring locations, the ground water zone monitored, the type of monitoring (CEA and/or TI), and the well designations (i.e., source area, plume, downgradient/edge of plume, and sentinel) was included with the November 14, 2019 email correspondence.

#### Damaged Monitoring Wells

Per the report, a few monitoring wells were damaged, including due to sampling equipment problems; one (1) off-site well was paved over. Any damaged well that is part of the monitoring program shall be replaced. For wells not part of the monitoring program and to be sealed, the presence of any sampling equipment must be addressed to ensure proper well sealing. Effort must be made to locate the paved over well.

If you have any questions on this review, please contact me at [steve.urbanik@dep.nj.gov](mailto:steve.urbanik@dep.nj.gov) or 609-984-7909.

Sincerely,



Stephen J. Urbanik, Case Manager  
Bureau of Case Management

c: Ana Minkhoff, RMC, Township Clerk, Township of Berkeley Heights  
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